



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 23, 2007

Claremont Ruff, Treasurer  
Cox 2008 Committee Inc.  
PO Box 5353  
Buffalo Grove, IL 60089

**Response Due Date:**  
**September 24, 2007**

Identification Number: C00420224

Reference: July Quarterly Report (4/1/07 - 6/30/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 items:

1. Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense," "media," "salary," "polling," "travel," "party fees," "phone banks," "travel expenses," "travel expense reimbursement," and "catering costs." Examples of election day and voter registration activity include "exit polling," "door-to-door get out the vote," "get out the vote phone calls," and "driving voters to the polls." Unacceptable descriptions, which require additional clarification, include but are not limited to "advance," "consulting," "political consulting," "commission," "contract labor," "retainer," "election day expense," "expenses," "invoice," "support," "expense reimbursement," "miscellaneous," "professional services," "get-out-the-vote," "voter registration," "child support," "convention," "debate expenses," "invoice number," "production services," "Republican Leadership PAC," "retainer," "services performed," "services rendered," "services through 06.13.07," and "studio production." (11 CFR § 104.3(b)(4)(A))

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at [http://www.fec.gov/law/policy/purposeofdisbursement/notice\\_2006-23.pdf](http://www.fec.gov/law/policy/purposeofdisbursement/notice_2006-23.pdf). Please amend Schedule B-P of your report to correct the descriptions that do not meet the requirements of the Regulations.

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2. Schedule B-P of your report discloses reimbursements to individuals for transactions other than travel, meals and lodging. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. If itemization is not necessary, you must indicate so in an amendment to this report. Please correct your report to include the missing information. (11 CFR § 104.9(a) & (b))

3. On Schedules B-P of your report, you have itemized disbursements to Merrimack Restaurant with the purpose of "rent". Please amend your report to clarify these expenses. (11 CFR § 104.3(b)(4))

4. Schedule C-P of your report fails to include information required by Commission Regulations. With every report submitted, you must provide the date incurred, the original source and amount of the loan, the due date, the interest rate, the cumulative payment, and the outstanding balance. In addition, if there are any endorsers or guarantors, their mailing address along with the name of their employer and occupation must be disclosed. Please amend your report to include the due date of the loan from John H. Cox on 4/15/07 in the amount of \$15,000.00. (11 CFR §§ 100.52(a), 100.52(b) and 104.3(d))

5. Schedules C-P of your report disclose outstanding loans from the candidate's personal funds reported with an interest rate of 5.10%; however your report does not disclose any interest payments or interest carried as debt. Please note that outstanding accrued interest on loans must be reported on Schedule D-P, while interest payments on loans must be reported as operating expenditures on Line 23 of Schedule B-P. (11 CFR §§ 104.3(b) and (d)) If necessary, please amend your report to disclose any interest payments.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather

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than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,



Christian Hilland  
Campaign Finance Analyst  
Reports Analysis Division

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